

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ELLIE SHKOLIR, RASHAD WILLIAMS, and
EVGENII BADGAEV,

Case No.: 1:23-cv-7256 (OEM) (PK)

Plaintiffs,

DECLARATION

-against-

RX2GO, INC. and ERKIN SATTAROV,

Defendants.

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Erkin Sattarov, declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury,
that the following is true and correct:

1. I am a Defendant in the above-referenced case and the principal of Rx2Go.
2. As such, I am familiar with the facts and circumstances set forth herein based upon my own personal knowledge and a review of the files maintained by Rx2Go.
3. The Plaintiffs have asked for documents concerning the following information: (a) For Mr. Shkolir - documentation showing onboarding paperwork, applications, or other similar "start of work type" document showing when his start date was; (b) For Mr. Badgaev - documentation and records showing that he was paid through some other entity other than the one he later formed; (c) A "per delivery" price breakdown; (d) A breakdown of what each payment was for - which deliveries, tips, deductions, or whatever else; (e) Tips: another search for additional records (along for those related to the new Plaintiff, for whom no tips records have yet been produced); and (f) Defendant's counsel is going to get with his clients to see what exists and will both let Plaintiffs' counsel know and produce what they can by Fri 8/16; to the extent no additional documents exist, an attestation / certification by Defendants toward that end.

4. I address each of them *seriatim* below.

Documentation as to the First Date Shkolir Performed Services for Rx2Go

5. Whenever Rx2Go engages a vendor to perform services for it, the vendor registers to obtain access to Rx2Go's platform.

6. Like many vendors who go in business for themselves, Shkolir formed the corporation Illusha Corp.; this is the corporation Rx2Go paid for services performed by Shkolir and anyone that he may have hired to assist him at Illusha Corp.

7. Our records show that Illusha Corp. was added as a vendor on May 23, 2019. See copy of screenshot from Rx2Go's database of vendors annexed hereto as **Exhibit "A."**

Documentation as to Entities Owned by Badgaev

8. The only entity we are aware that Badgaev owns is Elista Inc.

9. As reflected in Exhibit A, Elista Inc. was registered as a vendor in Rx2Go's system on November 25, 2020.

10. Further, we reviewed all payments made to Badgaev and have confirmed that all payments to him were made to Elista Inc.

"Per Delivery" Price Breakdown

11. Defendants will be producing documents that display the price paid per delivery.

Breakdown of payments

12. All payments made by Rx2Go reflect payment for deliveries made.

13. The tip payments were invariably paid in cash, and no tip payments are reflected in the discovery submitted thus far.

14. Rx2Go has no record of any deductions made from compensation for services rendered by Plaintiffs.

15. I am also not aware of any deductions taken from the compensation paid to any of the Plaintiffs for services rendered.

Tips

16. I conducted a search for any additional tip records; other than what was produced already, there are no additional tip records for the named Plaintiffs.

17. Defendants will be producing documents concerning tips for Mr. Badmaev.

Search for Records

18. I met with my attorney in a virtual meeting to review the documents requested by Plaintiffs in ECF Docket Entry 37.

19. I conducted a search by looking at the files maintained on the network for Rx2Go at its headquarters in Brooklyn, NY.

20. All searches were conducted by using the corporate entity's name.

21. The search produces information which is contained in the documents Defendants produced Bates stamped D1 through D1424.

22. Other than these documents and text messages exchanged between the Plaintiffs and others working or performing services for Rx2Go, I have not discovered any additional documents responsive to these requests.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 15, 2024.

Erkin Sattarov
Erkin Sattarov (Aug 15, 2024 10:51 PDT)
Erkin Sattarov

UID	Name	Registered
219207205	START UP USA CORP	2019-05-23 12:27:10
219208246	ELISTA INC	2020-11-25 12:41:09
219208274	ILLUSHA CORP	2020-12-03 11:26:25
219209189	RASHAD ELITE SERVICES INCORPORATED	2021-11-03 11:28:33